IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

MICHAEL JENKINS, et al. :

Plaintiffs,

: Civil Action No.

v. : 3:23-cv-374-DPJ-ASH

:

RANKIN COUNTY, MISSISSIPPI, et al.,

:

Defendants. :

CONSENT MOTION TO MODIFY SCHEDULING ORDER FOR THE PURPOSES OF JEFFERY MIDDLETON'S DEPOSITION

Now comes counsel for plaintiffs Jenkins and Parker, with the consent of opposing counsel, under the Federal Rules of Civil Procedure, move this Court to modify the current scheduling order for the purposes of taking Jeffery Middleton's deposition on March 14, 2025. This request for modification is made in good faith. Due to conflicting schedules of counsel for both parties and the logistical issues of setting up defendant Jeffery Middleton's deposition.

We have agreed to take Mr.Middleton's deposition outside the existing discovery deadline, which ends on March 7, 2025. Mr. Middleton's March 7, 2025 deposition did not occur because Mr. Middleton was moved from his FTC prison location in Oklahoma.

In conclusion, for the foregoing reasons, plaintiffs' counsel, with the consent of defense counsel for Sheriff Bryan Bailey and Jeffery Middleton, seek the Court's permission to modify the existing scheduling order to allow for a single deposition of defendant Jeffery Middleton on March 14, 2025.

Respectfully submitted by:

/s/ MALIK SHABAZZ ESQ /S/
MALIK SHABAZZ, Esq.
The Law Office of Malik Shabazz, Esq.
D.C. Bar # 458434
700 Pennsylvania Ave SE
Washington, DC 20003

Email: <u>Attorney.shabazz@yahoo.com</u> Tel: (301) 513-5445

Fax: (301) 513-5447 (Lead counsel for Plaintiff)

/S/ TRENT WALKER ESQ /S/

TRENT WALKER, Esq.

The Law Offices of Trent Walker M.S.B. #10475 5245 Keele Street Suite A Jackson, Mississippi 39206 Email:Trent@Trentwalkeresq.com (Mississippi Local Counsel) (601) 321-9540

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, THAT ON MARCH 10, 2025 I HAVE ELECTRONICALLY TRANSMITTED THE MOTION TO MODIFY SCHEDULING ORDER TO ALL COUNSEL OF RECORD USING THE ECF COURT FILING SYSTEM

Sincerely,

/S/ Malik Shabazz, Esq./S/ MALIK SHABAZZ ESQ.